

February 20, 2024

VIA ECF

Hon. Robyn F. Tarnofsky
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Room 703
New York, NY 10007

Re: *Verdi v. Federal Deposit Insurance Corporation as Receiver for
Signature Bank, et al.*, Case No. 24-cv-00791-DEH-RFT (S.D.N.Y.)

Dear Judge Tarnofsky:

Plaintiff Cameron N. Verdi and Defendant Federal Deposit Insurance Corporation as Receiver for Signature Bank (“FDIC-R”) write jointly pursuant to Rules I.D and I.E of Your Honor’s Individual Practices in Civil Cases and respectfully request that the Court (i) adjourn the Initial Case Management Conference (the “Conference”) scheduled for March 12, 2024 pursuant to the Court’s Order, dated February 7, 2024 (the “Order”) (ECF No. 27), and (ii) stay discovery until this Court decides the FDIC-R’s motion to dismiss that was filed on February 16, 2024. *See* ECF No. 27. The parties jointly make this request in order to conserve the parties’ and the Court’s time and resources while the FDIC-R’s motion to dismiss is pending. The parties have not previously requested that this Court adjourn the Conference or stay discovery pending a decision on the FDIC-R’s motion to dismiss, except that Plaintiff and the other Defendants jointly requested that the Court vacate all the deadlines in the Order as to the Other Defendants, which the Court granted by Order dated February 16, 2024. *See* ECF No. 34.

The FDIC-R moved to dismiss on February 16, 2024 and briefing will be concluded by April 2, 2024, approximately three weeks after the scheduled date for the Conference. *See* Order. The FDIC-R’s motion to dismiss involves a discrete issue that, if granted, would dispose of the entire case. The parties have agreed that adjourning the Conference and staying discovery until after this Court rules on the FDIC-R’s motion to dismiss would be efficient as it would avoid potentially unnecessary litigation costs for Plaintiff, who is proceeding *pro se*, and FDIC-R, which serves as the Receiver for Signature Bank, in connection with preparing for the Conference and conducting discovery. Additionally, as noted above, the Court vacated the deadlines in the Order for the other Defendants, so it would not be efficient to proceed with the Conference and the related deadlines in the Order without the involvement of all parties.

For the foregoing reasons, Plaintiff and FDIC-R jointly request that the Court adjourn the Conference and all related Rule 26(f) discovery deadlines, and stay discovery until this Court decides the FDIC-R’s motion to dismiss.

Plaintiff and the FDIC-R thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ Ryan A. Kane

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/s/ Cameron N. Verdi

Cameron N. Verdi

Pro Se Plaintiff

Plaintiff and Defendant FDIC-R's application to stay discovery pending resolution of the motion to dismiss is GRANTED.

Dated: February 20, 2024
New York, New York

SO ORDERED:



ROBYN F. TARNOFSKY
UNITED STATES MAGISTRATE JUDGE